

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

MAHMOUD KHALIL,

*Petitioner,*

v.

WILLIAM P. JOYCE, *et al.*,

*Respondents.*

*Civ. Act. No. 25-cv-1963*

**DECLARATION OF FIELD OFFICE DIRECTOR MELISSA HARPER**

I, Mellissa Harper, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am employed by U.S. Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”), Enforcement and Removal Operations (“ERO”), and currently serve as Field Office Director (“FOD”) at the New Orleans Field Office. I have held this position since November 20, 2022. I have been employed by ICE, and the former Immigration and Naturalization Service, in various capacities since September 23, 2001.
2. In my current position, I oversee several aspects of the immigration enforcement process, including the identification and arrest, transportation, detention, case management, and removal of noncitizens. In this capacity, I manage ERO personnel and provide oversight over a number of detention facilities within the New Orleans Field Office, including the Central Louisiana ICE Processing Center (“CLIPC”) in Jena, Louisiana.
3. I am aware that Mahmoud Khalil (“Khalil”) has filed a Petition for a Writ for Habeas Corpus before this Court.

4. On March 9, 2025, Khalil was served with DHS Form I-862, Notice to Appear (“NTA”) ordering him to appear before an immigration judge of the United States Department of Justice on March 27, 2025, at 8:30 a.m. On that same day, the NTA was filed online with the Executive Office for Immigration Review (“EOIR”) Court & Appeals System (“ECAS”).
5. On March 10, 2025, EOIR sent a case notice to Khalil and DHS setting a master calendar hearing, Khalil’s first appearance in removal proceedings, before the immigration court on March 21, 2025, at 8:30 a.m. CT. DHS has no control over when EOIR schedules the initial master calendar hearing.
6. On March 21, 2025, Khalil and his counsel appeared before Assistant Chief Immigration Judge Jamee Comans, LaSalle Immigration Court, for his initial master calendar hearing. At the initial master calendar hearing, the immigration judge is required to explain the alien’s rights, the charges against the alien, and the nature of the proceedings. Additionally, at the first or subsequent master calendar hearing, the alien is required to plead to the allegations and charges in the NTA, either admitting or denying them. Khalil’s counsel waived formal reading of the charges contained in the NTA and explanation of rights; this is routinely waived when an alien is represented by counsel.
7. Upon questioning by the immigration judge as to how Khalil pleaded to the allegations and charges in the NTA, counsel for Khalil did not enter pleadings and reasserted his motion to continue the master hearing to April 9, 2025.
8. DHS opposed the continuance because Khalil is detained.
9. The immigration judge granted the continuance of the initial master calendar hearing to April 8, 2025, at 1:00 p.m. CT and advised Khalil that he should be prepared to enter pleadings and identify relief on that day.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of April 2025.

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Mellissa B. Harper  
Field Office Director  
New Orleans Field Office  
Enforcement & Removal Operations  
U.S. Immigration and Customs Enforcement